

**BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

In the Matter of the Application of Southern California Edison Company (U 338-E) for a Certificate of Public Convenience and Necessity Concerning the Devers-Palo Verde No. 2 Transmission Line Project.

Application 05-04-015
(Filed April 11, 2005)

Order Instituting Investigation on the Commission's Own Motion into Methodology for Economic Assessment of Transmission Projects.

Investigation 05-06-041
(Filed June 30, 2005)

**COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON PHASE 1 ISSUES FOLLOWING WORKSHOP**

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October 7, 2005

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In accordance with the Administrative Law Judge's Ruling Addressing Schedule and Other Procedural Matters ("ALJ Ruling"), dated September 26, 2005, the California Independent System Operator Corporation ("CAISO") submits the following opening comments one day out-of-time.

I. Introduction and Summary

The ALJ Ruling requested comment on six issues associated with the above-referenced investigation that will be addressed in Phase 1 of the coordinated proceeding:

- What general principles or methodologies should be employed in assessing the economic benefits of transmission projects within the Commission's jurisdiction?
- Is the CAISO's TEAM approach, as applied to Path 26 and to DPV2, consistent with such general principles or methodologies?
- Are the suggested procedures enumerated above in this ruling a reasonable approach at this time for the Commission's assessment of the economic benefits of transmission projects?
- After the Commission adopts general principles or methodologies for assessing the economic benefits of transmission projects, how should the

Commission evaluate in a certification proceeding whether the CAISO, in evaluating economic need for the proposed project, has followed the guidance provided by the Commission in a reasonable manner?

- If the Commission determines in a certification proceeding for a transmission project proposed for its economic benefits that a CAISO assessment of need has followed the guidance provided by the Commission in a reasonable manner, are there additional requirements that must be met in the Commission's determination of economic benefits and need for the project?
- For those certification proceedings for transmission projects proposed for economic benefits where there is no CAISO assessment of need that the Commission has found to be reasonable and consistent with guidance provided in this investigation, what requirements should the Commission adopt for consideration of economic benefits and need?

The CAISO's instant comments focus on the regulatory use of the economic methodology, rather than on the first three questions, which address the substance of the methodology itself. Through the Commission-sponsored workshops held on September 14 and 15, 2005, the CAISO has provided detailed information outlining the fundamental TEAM principles and explaining why such principles are reasonable. For the convenience of the parties and the Presiding ALJ, the CAISO attaches its prior submission to its comments.

The CAISO submits these comments cognizant that efforts are proceeding among policy-makers and the various regulatory agencies with oversight of California's electric industry to reinvigorate a more integrated resource planning process. In this regard, the CAISO recently announced its intention to take a more proactive role in its own transmission planning process. The CAISO proposes to utilize its expertise and access to market data to proactively assess the economic impact of congestion and other reliability-related costs, i.e., Reliability Must Run contracts, and identify new transmission facilities that can provide economic benefits to ratepayers. Participating Transmission Owners ("PTOs") in the CAISO will then have an opportunity to evaluate the CAISO's projects

and offer alternatives, which, in turn, will be reviewed by the CAISO. It is contemplated that the PTOs will seek authorization to construct the superior alternative identified by the CAISO or, if they decline to do so, the CAISO will offer third-party investors the opportunity to construct the project based on a competitive bidding process and appropriate regulatory oversight.¹ Accordingly, to complement the CAISO's revised planning process, the CAISO believes it is important to achieve, at a minimum, narrow, near-term objectives of making the current siting process more efficient and increasing the likelihood of consistent regulatory outcomes between the CAISO and Commission in the context of an application for a certificate of public convenience and necessity ("CPCN").

To achieve these objectives, the instant proceeding must avoid pitfalls that plagued Rulemaking (R.) 04-01-026. That rulemaking proposed amending G.O. 131-D to allow the Commission to defer, in the context of a CPCN proceeding, to the prior determination by the CAISO of economic need. The Commission's review of need for an economic transmission project in the CPCN proceeding would be limited to confirming CAISO application of an adopted methodology – namely TEAM. However, as noted by President Peevey in his October 15, 2004, Assigned Commissioner's Ruling on Next Steps, the reaction to this approach by certain entities "raise[d] the specter of time-consuming and costly litigation, rather than timely, thoughtful reform." The litigation claims rested, in large part, on assertions that the type of deference proposed

¹ See, "New ISO Transmission Planning Process," <http://www2.caiso.com/docs/2001/06/04/2001060418221123496.html>.

constituted an unlawful delegation of Commission authority and violated due process protections.

It was the perception of a conclusory presumption in R.04-01-026 that contributed to the counter-productive and litigious posture of several vocal participants. The CAISO proposes to avoid this by recommending that where the CAISO has established that a transmission project will provide economic benefits to ratepayers, that a jurisdictional project proponent must only establish that base fact to trigger a rebuttable presumption of need that shifts the burden of proof to an opposing party to demonstrate by clear and convincing evidence that the project is not economic. Parties retain the right to challenge the presumption and the Commission does not delegate its decision-making discretion. Rather, the Commission is recognizing the CAISO's expertise and statutory responsibility in the area of transmission planning to give its determination special weight. Moreover, since the Commission is basing its regulatory treatment on attributes of the CAISO, rather than the particulars of the TEAM approach, adoption of, and compliance with, general principles is sufficient.

II. Commission's Authority to Implement Recommendation

If the Commission determines in a certification proceeding for a transmission project proposed for its economic benefits that a CAISO assessment of need has followed the guidance provided by the Commission in a reasonable manner, are there additional requirements that must be met in the Commission's determination of economic benefits and need for the project?

As noted above, the CAISO recommends that where the CAISO has established that a transmission project will provide economic benefits to ratepayers, that a jurisdictional project proponent must only establish that base fact to trigger a rebuttable presumption of need that shifts the burden of proof to an opposing party to demonstrate

by clear and convincing evidence that the project is not economic. Adopting such standards and procedures is well within the Commission's authority and overcomes many of the challenges raised during R.04-01-026.

California courts have recognized that the Commission "is not an ordinary administrative agency, but a constitutional body with far-reaching powers, duties and functions." (*Utility Consumers' Action Network v. Public Utilities Commission* (2004) 120 Cal.App.4th 644, 654; *Consumers Lobby Against Monopolies v. Public Utilities Commission* (1979) 25 Cal.3d 891, 905; Cal. Const., art. XII, §§ 1-6.) The constitution confers broad authority on the Commission, including, most importantly, the power to hold various types of proceedings and establish its own procedures. (Cal. Const., art. XII, §§ 2, 4, 6.) That the Commission possesses judicial and legislative powers is well established. (*People v. Western Air Lines, Inc.* (1954) 42 C.2d 621, 630.) Moreover, neither the technical rules of evidence nor the prescriptions of the Administrative Procedures Act apply to Commission adjudicatory proceedings. (Pub. Utilities Code § 1701.)

A presumption is not evidence. Rather, it is "an assumption of fact that the law requires to be made from another fact or group of facts found or otherwise established in the action." (Evid. Code § 600.) Here, the assumed fact is that the proposed project is economic based on the established fact that the CAISO previously found it to be so. Presumptions can be either conclusive or rebuttable. (Evid. Code § 601.) While a conclusive presumption is likely legally permissible notwithstanding the opposition raised during R.04-01-026, it is not absolutely necessary to gain the efficiencies sought by this investigation. However, if other more comprehensive changes are made to

California's resource planning process where, for example, the CAISO's transmission plan forms a component of an integrated resource plan adopted by the California Energy Commission or the Commission, it may be appropriate to revisit the type of presumption applied.

A rebuttable presumption may affect either the burden of producing evidence or the burden of proof. (Evid. Code § 601.) The CAISO suggests the latter is appropriate. A presumption affecting the burden of proof is intended to “establish or implement some public policy other than facilitation of the particular action in which it applies.” (Evid. Code § 605; *State Compensation Ins. Fund v. Workers' Comp. Appeals Bd.* (1995) 37 Cal.App.4th 675, 682.) The public policy underpinning the proposed presumption rests on streamlining infrastructure development as well as promoting the CAISO's ability to fulfill its statutory responsibility to ensure the “efficient use and reliable operation of the transmission grid.” (Pub. Utilities Code § 345.) Further, Public Utilities Code § 334 provides explicitly that “[t]he proposed restructuring of the electric industry would *transfer* responsibility for ensuring short- and long- term reliability away from electric utilities and regulatory bodies to the Independent System Operator . . .” The ability to identify economic transmission projects is tantamount to ensuring the efficient use of the transmission grid and the CAISO has gathered the expertise to perform such function. Therefore, the present context conforms to the historic use of rebuttable presumptions that shift the burden of proof to fulfill a public policy.

Next is what proof is required to overcome the burden. The CAISO advances consideration of the “clear and convincing” standard. The clear and convincing standard requires that the evidence be so clear as to leave no substantial doubt in the mind of the

trier of fact. It must be sufficient strong to commend the unhesitating assent of every reasonable mind. (See, e.g., *Tannehill v. Finch* (1986) 188 Cal.App.3d 224.) This standard is more stringent than the typical “preponderance” standard, which only calls for probability, while clear and convincing demand a high probability. (*In re Angelia P.* (1981) 28 Cal.3d 908.)

Given the Commission’s broad powers to determine its own procedures for the conduct of matters within its jurisdiction, nothing would appear to prohibit the adoption of a rebuttable presumption that shifts the burden of proof to a project opponent to establish by clear and convincing evidence that the project is not economic and therefore not needed. Similarly, the solution does not implicate due process or delegation concerns. Due process of Commission action is provided by the requirement of adequate notice to an affected party and an opportunity to be heard. (*People v. Western Air Lines, Inc., supra*, 42 C.2d at 632.) Nothing in the CAISO’s proposal alters the procedures afforded during a CPCN process. The project opponent continues to have the opportunity to marshal whatever evidence available to disprove that the project is, in fact, not economic to construct. Thus, all the process constitutionally due individuals potentially affected by the CPCN application has been, or will be, satisfied.²

² “[Due] process is flexible and calls for such procedural protections as the particular situation demands.” (*Morrissey v. Brewer* (1972) 408 U.S. 471, 481.) Since the types of property protected the due process clause vary widely, what may be required by that clause in dealing with one set of interests may not be required in dealing with another set of interests. (*Arnett v. Kennedy* (1974) 416 U.S. 134.) The deprivation of liberty interests or those benefits constituting “means for daily subsistence” are accorded greater procedural protection than mere economic interests. Even assuming that a property interest existed in a determination of economic or reliability need, that interest would be tangential, at best, and largely affecting an economic interest. Consequently, the process contemplated by the CAISO satisfies the flexible requirements of due process.

Several parties in R.04-01-026 cited *Cal. Sch. Employee's Ass'n v. Pers. Comm'n of the Pajaro Valley Unified School Dist.* (1970) 3 Cal.3d 139, 144, for the proposition that powers conferred upon public agencies that involve the exercise of judgment or discretion cannot be surrendered or delegated to subordinates. The CAISO proposal involves no delegation whatsoever. The Commission remains the ultimate finder-of-fact regarding whether, after weighing submitted evidence, the presumption has or has not been overcome. Simply put, the change has been by the Commission over its own internal procedures, not in its functions or ultimate authority to determine the outcome of the CPCN proceeding.

III. A Report Demonstrating Compliance With the Guidelines Should Suffice

After the Commission adopts general principles or methodologies for assessing the economic benefits of transmission projects, how should the Commission evaluate in a certification proceeding whether the CAISO, in evaluating economic need for the proposed project, has followed the guidance provided by the Commission in a reasonable manner?

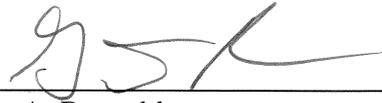
Two points are relevant to the showing prompting the rebuttable presumption. First, it should again be emphasized that given the presumption rests on recognition of the CAISO's statutory duty to efficiently plan for and operate the grid and the assumption the CAISO fulfills its duty, adoption of general principles is sufficient to justify the presumption. Second, some description of how the principles were complied with must be submitted. This second requirement can be accomplished by requiring the CAISO provide in the CPCN proceeding a report describing how it followed the Commission's guidelines.

IV. Conclusion

Based on the foregoing, the CAISO recommends that where the CAISO has established that a transmission project will provide economic benefits to ratepayers, that a jurisdictional project proponent must only establish that base fact to trigger a rebuttable presumption of need that shifts the burden of proof to an opposing party to demonstrate by clear and convincing evidence that the project is not economic.

October 7, 2005

Respectfully Submitted:

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CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, a copy of the foregoing Comments Of The California Independent System Operator Corporation On Phase 1 Issues Following Workshop to each party in Docket Nos. A.05-04-015 and I.05-06-041.

Executed on October 7, 2005 at Folsom, California.


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